

Privacy Policy

Mora Capital Holdings LLC is a group of financial companies comprised of Mora Capital Management LLC, an SEC registered investment adviser & Mora Capital Securities LLC, a FINRA member broker-dealer (hereafter collectively referred to as “Mora” “us” “we” or “our”), which are wholly owned subsidiaries of MoraBanc. At Mora, we know that privacy is an important issue for clients. It is our policy to respect the privacy of all accounts that we serve as introducing broker and to protect the security and confidentiality of nonpublic personal information relating to those accounts.

Consumer Privacy Notice: Mora believes in protecting the confidentiality and security of information we collect about individuals. This notice describes the privacy policy followed by Mora regarding how we treat the information we receive (“Information”) about individuals who apply for or obtain our products or services (“Individuals”) and the third parties with whom we may share this information.

Information We Collect: In order to service your account(s), Mora obtains public and “Non-Public Information” from you, and third parties that service your account. This information is collected in order to provide the financial services you have requested. We collect Non-Public Personal Information about Individuals from the following sources:

- Information provided to us directly by an Individual on an application or other form in connection with our products or services. This may include but is not limited to: name, address, telephone number, social security number, occupation, assets, and income;
- Information about an individual’s transactions with us, our affiliates, or others, such as account balance, payment history, parties to a transaction, credit/debit card usage, credit report and insurance policy coverage and premiums;
- Information which may be received from consumer reporting agencies, such as credit bureau reports and other Information relating to your creditworthiness; and
- Information which may be received from other sources with your consent or with the consent of the investment consultant/advisor or clearing broker servicing your account.

Sharing Of Non-Public Information: In connection with servicing your account, your non-public personal information may be shared among entities named in this notice, their affiliates, and non-affiliates who provide services regarding or relating to your account, including transfer agents or other service companies. Our affiliates and any non-affiliated service providers are required to protect the confidentiality of your information and to use the information only for the purposes for which disclosure to them is made. Service providers restrict access to nonpublic personal information about you to those employees who need to know that information to provide products and services to you. We, our affiliates, and the service providers we use maintain physical, electronic, and procedural safeguards to maintain the security of your nonpublic personal information.

Disclosure Of Information About Current and Former Customers: We do not disclose nonpublic personal Information of current or former customers to any third parties except as required or permitted by law and in order to facilitate the maintenance of accounts, processing, and clearing transactions in the ordinary course of business.

Protecting Confidentiality And Security: Mora treats Information in a confidential manner. Our employees are required to protect the confidentiality of Information maintained by the Firm. Employees may access Information only when there is an appropriate reason to do so, such as to administer or offer our products and services. Mora strives to ensure that our systems are secure and that they meet industry standards. Our commitment to data security involves monitoring new advances in security technology and enhancing our security architecture to ensure that we provide a high level of privacy for investment services firms and their customers. Where appropriate, we employ firewalls, encryption technology, user authentication systems (i.e. passwords and personal identification numbers) and access control mechanisms to control access to systems and data. Third parties who may have access to such personal Information must also agree to follow appropriate standards of security and confidentiality. In connection with recent regulatory requirements, and where appropriate, the firm may enhance its internal incident response process, how we notify you of possible breaches, the safeguarding and ensuring proper disposal of your customer information, including dealing with 3rd party service providers, and how we maintain records relating to these new requirements.

Access To Your Information: You may access your account Information through a variety of media offered by Mora and by our clearing firm or custodian (i.e., statements or online services). Please contact Mora if you require any additional information.

Protection Of Your Information: You can help safeguard your personal Information by taking a few simple precautions, which include but are not limited to:

- Do not disclose your account Information, personal identification numbers, passwords or code words to others;
- Never provide confidential Information to unknown callers;
- When utilizing the internet, be sure to use a secure browser and exit online applications as soon as you finish using them; and
- Ensure your personal computer has virus protection software and never open email from unknown sources.

Changes To This Policy: Mora reserves the right to make any changes to this policy.

Pershing LLC Privacy Policy is located at: FACTS

How To Contact Us About This Privacy Policy: If you have any questions after reading this Privacy Policy, please contact us by writing

to Privacy Management, c/o Compliance Department, Mora Wealth Management, 1450 Brickell Avenue, Suite 2900 Miami, Florida 33131 Telephone: (305) 459-5415 Fax: (305) 459-5401 or Email: miami.compliance@Moracm.com .